

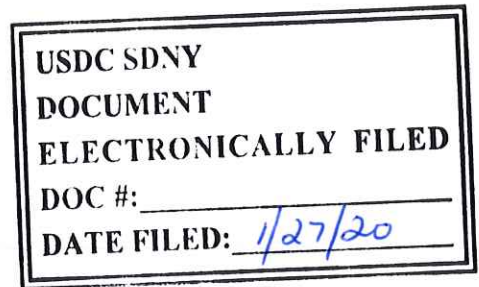
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ATTORNEYS AT LAW

January 10, 2020



MEMO ENDORSED

Via ECF

Hon. Kimba M. Wood
United States District Judge
United States District Court-Southern District of New York
500 Pearl Street, Courtroom 26A
New York, New York 10007

Re: *United States v. Gordon Freedman*
Dkt.: 19 Cr 249 (KMW)

Dear Judge Wood:

I write to the Court with respect to the above matter. This Court accepted transfer of this matter from the Hon. Alison J. Nathan (ECF docket entry 16). I respectfully request that this matter be calendared for sentence on March 19, 2020 at 11am or as soon thereafter as counsel can be heard. This Court has set the sentencing after trial in the related matter, *United States v. Gordon Freedman*, 18 Cr 217, for 11am. It is the position of Dr. Freedman that the matters should be sentenced on the same day and at the same time as the issues are unquestionably related. This Court is authorized to consider any sentence to be imposed on a defendant in fashioning any other sentence to be imposed upon the defendant in any other proceeding. By having the sentencing on the same day and at the same time, Dr. Freedman and his family will be spared the pain of enduring two separate sentencing proceedings. I further understand from the Government that at least one victim's family is expected to speak at sentencing, and so it seems essential to this Court to hear from the victims when it fashions the appropriate sentences, rather than taking the evidence piecemeal as if it were assembling Lego pieces.

The Government consents to have the matters scheduled for the same day, but believes that the matters must be heard in separate proceedings because they are two separate cases: two indictments, two docket numbers, with different appellate rights in each case.

As Dr. Freedman has an advanced medical degree, his counsel has nearly thirty years of criminal defense practice, this Court has sat as a jurist for more than thirty years, and the Government is ably represented by three counsel, the undersigned suggests that the nuances

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Therefore, I respectfully request that this matter be scheduled for sentencing on March 19, 2020 at 11am.

In order to allow Probation time to prepare two PSRs, the Court adjourns sentencing to April 23, 2020, at 11:00 a.m. The Court will sentence the defendant on 18cr217, then immediately proceed to sentencing on 19cr249.

Respectfully submitted,

_____/s/ Sam Braverman
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Cc: AUSA's Katherine Reilly, David Abramowicz, and Noah Solowiejczyk

SO ORDERED: N.Y., N.Y. 1/22/20

Kimba M. Wood

KIMBA M. WOOD
U.S.D.J.